

**NATALIE K. WIGHT, OSB #035576**

United States Attorney

District of Oregon

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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**PORTLAND DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**Case No. 3:25-cv-00058-MO**

**v.**

**COMPLAINT *IN REM* FOR  
FORFEITURE**

**3,086,226.36 USDT seized from a  
Binance account with User ID  
111213443 held in name of Nan Song,**

**and**

**3.41 BTC, or equivalent cryptocurrency,  
stored in an OKX account with User ID  
460511322279437347 held in the name  
of Yao Lutao, *in rem*,**

**Defendants.**

Plaintiff, United States of America for its Complaint *in rem* for forfeiture, alleges:

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 21 U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendants, *in rem*, 3,086,226.36 USDT seized from a Binance account with User ID 111213443 held in name of Nan Song and 3.41 BTC, or equivalent cryptocurrency, stored in an OKX account with User ID 460511322279437347 held in the name of Yao Lutao, are subject to forfeiture in the District of Oregon, and are now and during the pendency of this action will be within the jurisdiction of this Court.

**COUNT 1**

III.

Defendants, *in rem*, 3,086,226.36 USDT seized from a Binance account with User ID 111213443 held in name of Nan Song and 3.41 BTC, or equivalent cryptocurrency, stored in an OKX account with User ID 460511322279437347 held in the name of Yao Lutao, were involved in transactions or attempted transactions or traceable to money laundering offenses in violation of 18 U.S.C. § 1956(a)(1)(B)(i) (concealment money laundering), and are forfeitable to the United States pursuant to the provisions of 18 U.S.C. § 981(a)(1)(A) & (C), as more particularly set forth in the Declaration of Special Agent Eric Hiser, Federal Bureau of Investigation (FBI), marked as Exhibit A, attached and fully incorporated herein by this reference.

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**COUNT 2**

## IV.

Defendants, *in rem*, 3,086,226.36 USDT seized from a Binance account with User ID 111213443 held in name of Nan Song and 3.41 BTC, or equivalent cryptocurrency, stored in an OKX account with User ID 460511322279437347 held in the name of Yao Lutao, were involved in transactions or attempted transactions or traceable to violations of 18 U.S.C. § 1957 (unlawful monetary transactions in excess of \$10,000), and are forfeitable to the United States pursuant to the provisions of 18 U.S.C. § 981(a)(1)(A) & (C), as more particularly set forth in the Declaration of Special Agent Eric Hiser, Federal Bureau of Investigation (FBI), marked as Exhibit A, attached and fully incorporated herein by this reference.

**COUNT 3**

## V.

Defendants, *in rem*, 3,086,226.36 USDT seized from a Binance account with User ID 111213443 held in name of Nan Song and 3.41 BTC, or equivalent cryptocurrency, stored in an OKX account with User ID 460511322279437347 held in the name of Yao Lutao, is property constituting or derived from proceeds obtained, directly or indirectly, from a violation of 18 U.S.C. § 1343 (wire fraud), and are forfeitable to the United States pursuant to the provisions of 18 U.S.C. § 981(a)(1)(A) & (C), as more particularly set forth in the Declaration of Special Agent Eric Hiser, Federal Bureau of Investigation (FBI), marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, Plaintiff, United States of America, prays that due process issue to enforce the forfeiture of Defendants, *in rem*, 3,086,226.36 USDT seized from a Binance account with User ID 111213443 held in name of Nan Song and 3.41 BTC, or equivalent cryptocurrency, stored in an OKX account with User ID 460511322279437347 held in the name of Yao Lutao; that due notice be given to all interested persons to appear and show cause why forfeiture of these Defendants, *in rem*, should not be decreed; that due proceedings be had thereon; that these Defendants be forfeited to the United States; that the Plaintiff United States of America be awarded its costs and disbursements incurred in this.

Dated: January 13, 2025.

Respectfully submitted,

NATALIE K. WIGHT  
United States Attorney

/s/ Julia E. Jarrett  
**JULIA E. JARRETT**  
Assistant United States Attorney

### **VERIFICATION**

I, ERIC HISER declare, under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Special Agent with the Federal Bureau of Investigation and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

/s/ Eric Hiser  
**ERIC HISER**  
Special Agent  
Federal Bureau of Investigation